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November 17, 2004

Michael O. Leavitt, Administrator  
U.S. Environmental Protection Agency  
Ariel Rios Building, 1101-A  
1200 Pennsylvania Ave., N.W.  
Washington, DC 20460

Subject: Comments on the HPV Test Plan for p-Toluenesulfonyl isocyanate

Dear Administrator Leavitt:

The following comments on ISOICHEM's test plan for the chemical p-Toluenesulfonyl isocyanate are submitted on behalf of the Physicians Committee for Responsible Medicine, People for the Ethical Treatment of Animals, the Humane Society of the United States, the Doris Day Animal League, and Earth Island Institute. These health, animal protection, and environmental organizations have a combined membership of more than ten million Americans.

ISOICHEM Inc. submitted its test plan on June 12, 2004, for the chemical p-Toluenesulfonyl isocyanate (CAS No. 4083-64-1), also known as PTSI. This substance is a highly reactive sulfonyl isocyanate used as a water scavenger in the formulation of specialty urethane products including adhesives, sealants, and coatings. We are pleased to see that ISOICHEM describes PTSI as being unstable in water and immediately hydrolyzes to carbon dioxide and p-Toluenesulfonamide (CAS No. 70-55-3). Although limited data exist for PTSI, we commend the sponsor's use of toxicity data from the hydrolysis product, p-Toluenesulfonamide, to fulfill SIDS endpoints for aquatic and mammalian toxicity. We concur that no additional animal tests for PTSI should be required under the HPV program.

ISOICHEM submitted a scientifically valid and thoughtful analysis of the toxicity of PTSI by first studying the hydrolysis products of the sponsored chemical. This approach has been accepted by the EPA in previous test plans and is consistent with the EPA's stated goal of maximizing the use of existing data in order to limit additional animal testing and to avoid a mere box-checking approach to toxicology.

Thank you for your attention to these comments. I may be reached at 202-686-2210, ext. 327, or via e-mail at [meven@pcrm.org](mailto:meven@pcrm.org).

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Sincerely,

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Research Analyst

Chad B. Sandusky, Ph.D.  
Director of Research and Toxicology